

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DONG WANG,

Plaintiff,

v.

UR MENDOZA JADDOU, *et al.*,

Defendants.

Case No. 2:24-cv-01733-RSL

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until July 10, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship and Immigration Services (“USCIS”) adjudicate her Form I-589, Application for Asylum and for Withholding of Removal. Defendants’ response to the Complaint is currently due on December 10, 2024. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until July 10, 2025.

1 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706
2 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to
3 control the disposition of the causes on its docket with economy of time and effort for itself, for
4 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
5 P. 1.

6 With additional time, this case may be resolved without the need of further judicial
7 intervention. USCIS has scheduled Plaintiff’s asylum interview for March 12, 2025. USCIS
8 agrees to diligently work towards completing the adjudication within 120 days of the interview,
9 absent unforeseen or exceptional circumstances that would require additional time for
10 adjudications. If the adjudication is not completed within that time, USCIS will provide a status
11 report to the Court. Plaintiff will submit all supplemental documents and evidence, if any, to
12 USCIS seven to ten days prior to the interview date. Plaintiff recognizes that failure to submit
13 documents prior to the interview may require the interview to be rescheduled and the
14 adjudication delayed. If needed, Plaintiff will bring an interpreter to the interview, otherwise the
15 interview will need to be rescheduled and the adjudication delayed. After the interview, USCIS
16 will need time to adjudicate Plaintiff’s asylum application. Once the application is adjudicated,
17 Plaintiff will dismiss the case with each party to bear their own litigation costs and attorneys’
18 fees. Accordingly, the parties request this abeyance to allow USCIS to conduct Plaintiff’s
19 asylum interview and then process her asylum applications.

20 As additional time is necessary for this to occur, the parties request that the Court hold
21 the case in abeyance until July 10, 2025. The parties will submit a joint status report on or
22 before July 10, 2025.

23 //

24 //

1 DATED this 10th day of January, 2025.

2 Respectfully submitted,

3 TESSA M. GORMAN
4 United States Attorney

LAW OFFICES OF DENNIS LAM, PLLC

s/ Michelle R. Lambert

5 MICHELLE R. LAMBERT, NYS #4666657
6 Assistant United States Attorney
7 United States Attorney's Office
8 Western District of Washington
9 1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: (253) 428-3824
Fax: (253) 428-3826
Email: michelle.lambert@usdoj.gov

s/ Dennis Lam

DENNIS LAM, WSBA #22899
15921 NE 8th Street, Ste. C-208
Bellevue, Washington 98008
Phone: (206) 682-9233
Email: dennis@dennislam.com

Attorney for Plaintiff

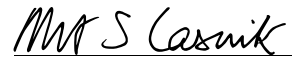
10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 412*
12 *words, in compliance with the Local Civil Rules.*

ORDER

The case is held in abeyance until July 10, 2025. The parties shall submit a joint status report on or before July 10, 2025. It is so **ORDERED**.

DATED this 13th day of January, 2025.


ROBERT S. LASNIK
United States District Judge